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March 22, 2024

Via ECF

Hon. Andrew M. Edison
601 Rosenberg, Seventh Floor
Galveston, TX 77550

Re: Edwards v. McDermott Int'l, et al., Case No. 4:18-cv-4330

Dear Judge Edison,

In accordance with the Court's March 15, 2024 Order (Dkt. 518), Defendants file this letter responding to Plaintiffs' March 14, 2024 Motion for Leave to File Confidential Documents Under Seal (Dkt. 510), which Plaintiff filed contemporaneously with its Objections to the Court's Memorandum and Recommendations ("Objections," Dkt. 511) and exhibits to those Objections (Dkts. 513-517).

By way of background, on the afternoon of March 14, Plaintiff advised Defendants that Plaintiff intended to "reference and quote" in its Objections unspecified excerpts from the transcripts of the depositions of "at minimum Dickson, Spence, and Mullen," which Defendants had designated Confidential pursuant to the Joint Protective Order (Dkt. 181). Defendants responded with a request that Plaintiff identify the specific deposition excerpts in question so Defendants could review and determine whether any or all required sealing, but Plaintiff responded that it would not be able to do so before filing the Objections.

Defendants have now reviewed the deposition excerpts that Plaintiff filed under seal (Dkts. 513-517), which included excerpts not just from the Individual Defendants' depositions but also from other witnesses' depositions, including a former employee represented by other counsel whose transcript was designated Confidential. Defendants do not believe any of the excerpted materials require sealing and will not be filing a motion to seal. Defendants also conferred with counsel for the former employee, who confirmed that he similarly does not intend to file a sealing motion.

Respectfully submitted,



Amy Pharr Hefley